

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CHARLES M. KUPPERMAN,)
Plaintiff,)
JOHN MICHAEL MULVANEY,)
Proposed Intervenor-Plaintiff)
v.)
UNITED STATES HOUSE OF)
REPRESENTATIVES,)
THE HONORABLE DONALD J. TRUMP,)
In his official capacity as President)
of the United States,)
THE HONORABLE NANCY PELOSI,)
In her official capacity as Speaker of the)
United States House of Representatives,)
THE HOUSE PERMANENT SELECT)
COMMITTEE ON INTELLIGENCE,)
THE HONORABLE ADAM B. SCHIFF,)
In his personal capacity as Chairman of the)
House Permanent Select Committee on)
Intelligence,)
THE HOUSE COMMITTEE ON FOREIGN)
AFFAIRS,)
THE HONORABLE ELIOT L. ENGEL,)
In his official capacity as Chairman of the)
House Committee on Foreign Affairs,)
THE HOUSE COMMITTEE ON)
OVERSIGHT AND REFORM,)
THE HONORABLE CAROLYN B.)
MALONEY, In her official capacity as)
Acting Chair of the House Committee on)
Oversight and Reform,)
)

) Case No. 19-cv-03224-RJL

Defendants.)
)
)
CABLE NEWS NETWORK, INC.,)
)
THE ASSOCIATED PRESS,)
)
THE NEW YORK TIMES CO.,)
)
DOW JONES & COMPANY, INC.,)
)
POLITICO LLC,)
)
REUTERS NEWS & MEDIA INC.,)
)
WP CO., LLC,)
d/b/a THE WASHINGTON POST,)
)
Proposed Intervenors)
)

CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1 and Local Civil Rule 26.1, undersigned counsel for Proposed Intervenors Cable News Network, Inc.; The Associated Press; The New York Times Co.; Dow Jones & Co., Inc.; POLITICO LLC; Reuters News & Media Inc.; and WP Co., LLC d/b/a The Washington Post hereby certify that:

1. Cable News Network, Inc. (“CNN”), a Delaware corporation, is a wholly owned subsidiary of Warner Media, LLC, a direct wholly-owned subsidiary of AT&T Inc., a publicly traded corporation. AT&T Inc. has no parent company and, to the best of CNN’s knowledge, no publicly held company owns ten percent or more of AT&T’s stock.

2. The Associated Press is a news cooperative incorporated under the Not-for-Profit Corporation Law of New York and has no parents, subsidiaries or affiliates that have any outstanding securities issued to the public.

3. News Corporation, a publicly held company, is the indirect parent corporation of Dow Jones & Company, Inc. (“Dow Jones”). Ruby Newco, LLC, an indirect subsidiary of News Corporation and a non-publicly held company, is the direct parent of Dow Jones. News Preferred Holdings, Inc., a subsidiary of News Corporation, is the direct parent of Ruby Newco, LLC. No publicly traded corporation currently owns 10 percent or more of the stock of Dow Jones.

4. The New York Times Company, a publicly traded company, has no parent company and one publicly held corporation, Black Rock, Inc., owns approximately 10 percent of its stock.

5. POLITICO LLC is a wholly owned subsidiary of privately held Capitol News Company, LLC.

6. Reuters News & Media Inc. (“Reuters”) is a wholly owned indirect subsidiary of Thomson Reuters Corporation, a publicly-held corporation traded on the New York Stock Exchange and Toronto Stock Exchange. There are no publicly held companies that own 10% or more of Thomson Reuters Corporation's stock.

7. WP Company LLC d/b/a The Washington Post is a wholly owned subsidiary of Nash Holdings LLC, which is privately held and does not have any outstanding securities in the hands of the public.

These representations are made in order that judges of this Court may determine the need for recusal.

Respectfully submitted,

Dated: November 11, 2019

BALLARD SPAHR LLP

By: /s/ Matthew E. Kelley

Jay Ward Brown (D.C. Bar No. 437686)

brownjay@ballardspahr.com

Matthew E. Kelley (D.C. Bar No. 1018126)

kelleym@ballardspahr.com

BALLARD SPAHR LLP

1909 K Street, NW

Washington, D.C. 20006-1157

T: (202) 508-1136

F: (202) 661-2299

Counsel for Proposed Intervenors

CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2019, I caused the foregoing to be filed and served electronically via the Court's ECF system upon all counsel of record.

/s/ Matthew E. Kelley
Matthew E. Kelley